

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO, WESTERN DIVISION

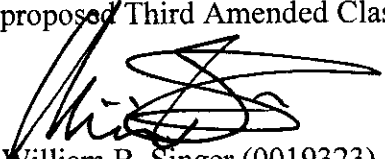
MILDRED W FINCH et. al.	:	Case No. C-1-02-132
Individually and as representatives		
of a class consisting of all persons		
who at various times	:	(Judge Beckwith)
purchased through the Defendant		
George Fiorini and others promissory	:	
notes issued by Standard Trust or		
Guardian Investments LLC	:	
 Plaintiffs	:	
 VS	:	MOTION FOR LEAVE TO
		FILE A THIRD AMENDED
GEORGE FIORINI, DBA	:	CLASS ACTION COMPLAINT
THE FIORINI AGENCY, et. al.	:	
	:	
 Defendants		

Plaintiffs hereby move for leave to file a third amended class action complaint, conforming to the proposed third amended class action complaint attached hereto and by reference made a part hereof as exhibit A.

MEMORANDUM

The proposed Third Amended Class Action Complaint seeks to set aside a fraudulent transfer which occurred early this year and which had the effect of removing from the process of the Court in this action all of the patented technology which had theretofore been the only valuable assets of the Defendant Sanitec Ltd. The transfer complained of completed a series of fraudulent transfers, the first of which occurred February 22, 2002, when Sanitec Ltd. transferred its patents to Santec Group LLC in

exchange for no or substantially inequivalent consideration. The February 17, 2004 transfer was from Sanitec Group LLC to the California corporation Sanitec Industries Inc., whom plaintiffs seek to add as parties defendant herein through his motion and the proposed Third Amended Class Action Complaint.



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CERTIFICATE OF SERVICE

I certify that copies of the foregoing Motion for Leave to File a Third Amended Class Action Complaint was served by ordinary mail upon George Fiorini, 7641 Wesselman Road, Cleves, Ohio 45001, Patrick J. Hanley, Esq., 214 E. 4th Street, Covington, KY 41011 attorney for Steven R. Ventre, and Guardian Investments LLC, on Richard Oparil, Esq., attorney of record for Sanitec Ltd., Patton Boggs LLP, 2250 M. Street, NW, Suite 500, Washington DC, 20037-1350 and Steven J. Miller, Esq., Goodman Weiss Miller, LLP, 100 Erieview Plaza, 27th floor, Cleveland, Ohio 44114-1824 attorney for defedandant Sanitec Ltd. on the ~~20~~ 27th day of July, 2004.

